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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CUNG LE, et al.,)	
)	
Plaintiffs,)	Case No. 2:15-cv-01045-RFB-BNW
)	
vs.)	Las Vegas, Nevada
)	Thursday, February 6, 2025
ZUFFA, LLC, d/b/a Ultimate)	9:29 a.m.
Fighting Championship and)	
UFC,)	MOTION HEARING
)	
Defendants.)	

C E R T I F I E D C O P Y

REPORTER'S TRANSCRIPT OF PROCEEDINGS
THE HONORABLE RICHARD F. BOULWARE, II,
UNITED STATES DISTRICT JUDGE

APPEARANCES: See Pages 2 and 3

COURT REPORTER: Patricia L. Ganci, RMR, CRR
United States District Court
333 Las Vegas Boulevard South, Room 1334
Las Vegas, Nevada 89101

Proceedings reported by machine shorthand, transcript produced
by computer-aided transcription.

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1 LAS VEGAS, NEVADA; THURSDAY, FEBRUARY 6, 2025; 9:29 A.M.

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3 P R O C E E D I N G S

4 COURTROOM ADMINISTRATOR: The matter now before the
5 Court is Le, et al., versus Zuffa, LLC, Case Number
6 2:15-cv-1045-RFB-BNW. Counsel, please make your appearances,
7 beginning with the plaintiffs.

8 MR. CRAMER: Good morning, Your Honor. Eric Cramer for
9 the plaintiffs.

10 MR. DELL'ANGELO: Good morning, Your Honor. Michael
11 Dell'Angelo for the plaintiffs.

12 MR. DAVIS: Good morning, Your Honor. Josh Davis for
13 the plaintiffs. Nice to see you.

14 MR. SILVERMAN: Good morning, Your Honor. Dan
15 Silverman for plaintiffs.

16 MR. POMERANTZ: Good morning, Your Honor. Crane
17 Pomerantz on behalf of plaintiffs.

18 MR. SAVERI: Good morning, Your Honor. Joseph Saveri
19 on behalf of plaintiffs.

20 THE COURT: Good morning.
21 For the defendants.

22 MR. ISAACSON: Bill Isaacson, Your Honor.

23 MR. WILLIAMS: Good morning, Your Honor. Colby
24 Williams on behalf of the defendants.

25 THE COURT: Good morning.

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1 So we are here for a few different motions in this
2 case. I have the motion for final approval of the settlement in
3 this case with a proposed order in this case. And that motion,
4 Mr. Isaacson, correct, is unopposed at this time?

5 MR. ISAACSON: More than at this time. It is
6 unopposed.

7 THE COURT: Yes. Okay. Hold on one moment. Let me
8 pull this up.

9 So, Mr. Cramer, I have reviewed the submission in this
10 case. I'm not sure if there's anything that you wanted to
11 emphasize. Hold on a moment.

12 (Court conferring with courtroom administrator.)

13 THE COURT: I'm sorry, Mr. Cramer.

14 MR. CRAMER: Your Honor, thank you.

15 The only thing I would like to add and to emphasize is
16 that all of class counsel are just extremely proud to have
17 represented the named plaintiffs in this class in this case, and
18 I'd just like to identify them and honor them. They're all here
19 today, and I'd ask them to rise when I say their name: Cung Le,
20 Jon Fitch, Javier Vazquez, Brandon Vera, Kyle Kingsbury, and
21 Nate Quarry.

22 All of these men were here fighting the fight for
23 fighter justice before we started this case in 2014. They were
24 with us every step of the way. They came to hearings. They all
25 were deposed. They produced 800,000 pages of documents. They

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1 kept the lawyers in check. They made sure we were doing the
2 right thing on behalf of the class. They did everything class
3 representatives are supposed to do and more. They're here today
4 and they're going to be here making sure that the allocation
5 plan, if this settlement is approved, is done fairly and
6 appropriately and efficiently. And they're going to be working
7 with us in the Johnson case to make sure that case is
8 successful.

9 So I'm just proud to have represented them. I want to
10 acknowledge their role. I want to honor them and say this case
11 wouldn't have succeeded without them.

12 Other than that, I will rest on the papers just to say
13 we're also thankful for Your Honor and all of the work Your
14 Honor did to get us to this day.

15 THE COURT: I appreciate that, Mr. Cramer. Thank you.

16 Again, I want to address the one -- it looks like we
17 have one objection --

18 MR. CRAMER: Correct.

19 THE COURT: -- which actually is not a complete
20 objection because then we had an e-mail, which I believe you and
21 Mr. Isaacson I think were copied on, that asked to clarify
22 information, but then basically supported the settlement. So I
23 don't know that I would categorize it as an actual objection.
24 There were some concerns raised, but then they were modified.
25 So that's my interpretation of that. I don't know that it's --

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1 it would qualify as a legal objection because this individual
2 encouraged me to approve the settlement.

3 So I don't know that I would see that as an objection
4 that would need to be addressed, and notwithstanding that, the
5 issues raised seemed to me to be issues that the Court finds are
6 addressed by the settlement. So I don't know if you just want
7 to address it briefly, Mr. Cramer, but --

8 MR. CRAMER: I would like to.

9 THE COURT: -- we have to do that. We have to address
10 objections and ask if there are any objections that need to be
11 raised. So if you want to address that.

12 And I know it's addressed by you all in the proposed
13 order, but on the record here if you would like to, please do
14 so.

15 MR. CRAMER: Yes, I would be happy to do so. And
16 there's sort of late-breaking news here, and I can hand up to
17 Your Honor an amended objection that Ms. Lomeli filed with the
18 Court yesterday. And she sent it to us and I've showed it to
19 Mr. Isaacson. If Your Honor permits --

20 THE COURT: Sure.

21 MR. CRAMER: -- I'll hand it up.

22 Your Honor, it basically repeats what she said in the
23 e-mail to the Court. And I'll just note she says that, "I
24 believe it is in the interest of the class to complete this
25 class action settlement in a timely manner. I would like the

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1 settlement to be approved in full without delay." She withdraws
2 any objection she had to the settlement of Mr. Quarry's
3 individual claim, and she closes that she urges the Court to
4 approve the settlement without delay.

5 And she has indicated to me and asked me to represent
6 to the Court that she supports the settlement, and that if -- if
7 her objection in any way delays anything, she would withdraw it.

8 THE COURT: Okay. Well, it looks to me like she's
9 objecting more to fees than she is to the settlement.

10 MR. CRAMER: Right.

11 THE COURT: Fees are part of the settlement, but
12 obviously that's a slightly separate consideration by the Court.

13 (Court conferring with courtroom administrator.)

14 MR. CRAMER: And I would be happy to address her
15 objection to a minor aspect of the fee when Your Honor -- if
16 Your Honor would like me to address that.

17 THE COURT: Well, again, I mean, since -- well, first,
18 let's just take this one step at a time.

19 MR. CRAMER: Okay.

20 THE COURT: So we have the one objection that we filed.
21 And so I will just ask if there is anyone here who would like to
22 lodge an objection to the settlement. If you support the
23 settlement, you don't have to say anything, right. This is the
24 time for any objection.

25 So is there anyone here who would like to come forward

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1 to lodge an objection to the settlement?

2 Okay. For the record, I see no one coming forward. So
3 let's then move onto the actual settlement itself. Again, I've
4 reviewed the settlement myself. I think the settlement
5 satisfies all of the *Helm* factors. It is fair, reasonable, and
6 appropriate for all of the reasons stated within the motion. It
7 would be my intention to sign the proposed order, perhaps, with
8 some small modifications. But I would ask you all to provide
9 that to us in Word format so we can make some small, sort of,
10 editing modifications, but no substantive modifications to the
11 order.

12 As I indicated previously, I think that this order is
13 fair and appropriate and addressed the concerns that the Court
14 had when it initially denied preliminary approval of the
15 settlement.

16 With respect to the fees, Mr. Cramer, if you would like
17 to address the one issue with respect to the fees since it was
18 raised, you can. I will tell you I don't find the fees in this
19 case to be unreasonable. In fact, Courts have approved much
20 higher percentages of fees with respect to this case.

21 And, so for me, given the amount of time that has been
22 spent on this case, the investment, the quality of the
23 representation in this case, the hours spent, the fees are
24 appropriate and deserved in this case. And so I don't see any
25 reason not to approve them, but I'm going to give you an

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1 opportunity to address specifically the issues that have been
2 raised.

3 Mr. Cramer.

4 MR. CRAMER: Your Honor, I know well enough to take yes
5 for an answer. I don't think I need to say anything else. I
6 appreciate Your Honor's statements.

7 THE COURT: Okay. Well, again, I'm going to approve
8 both motions at this time. I don't know that we need to do
9 anything else at this point for the record.

10 And, again, for the record, Mr. Isaacson, there's no
11 objection to the Court approving both motions from the
12 defendants. Is that correct?

13 MR. ISAACSON: That's correct, Your Honor. I was also
14 asked on behalf of the UFC to say that we would like the class
15 members to know the UFC does encourage them to file claims.
16 This is the type of case where rumors spread about different
17 things. The UFC is all in favor of the class members submitting
18 claims.

19 THE COURT: I appreciate that. I think that's
20 significant because, obviously, there's no reversion here. And
21 everyone who's a member of the class should get what is coming
22 to them based upon the settlement.

23 I trust, Mr. Cramer, that you all will make sure that
24 that happens. Given what I've seen in terms of the process
25 that's been outlined, I think that would be addressed. I think

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1 I will tell you my biggest concern is for individuals who are
2 not English speaking. I mean, this case has obviously had a
3 fair amount of media coverage, but I don't know how much
4 coverage there has been in other forms of media, particularly
5 for individuals who don't speak English. And I know there's a
6 fair number -- I don't know exactly what the percentage is, but
7 there are a fair number of the fighters for whom English is not
8 their native language.

9 MR. CRAMER: So we're very sensitive to that, Your
10 Honor, and let me tell you what we have done so far. We have
11 now -- and I have participated in three Zoom sessions, one in
12 Japanese with a Japanese translator with Japanese fighters in
13 Japan, one in Portuguese with Brazilian fighters, one in Russian
14 with Russian fighters. And we have one scheduled in Spanish
15 with Spanish-speaking fighters.

16 THE COURT: Right.

17 MR. CRAMER: So we've -- we've done that and we intend
18 to continue to do that. We've also translated the notice into
19 four -- those four languages.

20 So we are doing everything we can to make sure that the
21 fighters are aware of the settlement, that they are encouraged
22 to make claims, and that they do make claims. We also have now
23 collected names of 635 of the 1,100 fighters and addresses and
24 contact information already.

25 THE COURT: Okay.

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1 MR. CRAMER: So we'll be able to contact them directly.
2 I've spoken with dozens and dozens of fighters who are eager to
3 be able to make claims. So we're going to work very hard to
4 make sure that the money that we've won for them and that the
5 plaintiffs have won for them get distributed to the people who
6 deserve it, the clients.

7 THE COURT: Well, and I assume, Mr. Cramer and
8 Mr. Isaacson, you all are working together as it relates to
9 contact information. I know there's -- this class is at this
10 point several years old, and so there may be people for whom
11 it's difficult to find addresses. But I assume that there's
12 been no issues as it relates to addresses or contact
13 information, Mr. Isaacson.

14 MR. ISAACSON: Yeah, that's correct. We've been
15 sharing -- the UFC, not my -- not the lawyers, have been sharing
16 the information they have.

17 THE COURT: Okay.

18 MR. CRAMER: That's correct, Your Honor. We have all
19 of the contact information that the UFC had for all of the
20 fighters in the class, but we've been following up in the manner
21 that we described and in other ways. So we're going to make a
22 very strong effort to make sure that the claims rate is as high
23 as possible.

24 THE COURT: Okay. Because, again, Mr. Cramer, I think
25 given how much effort has been put into this case and given I

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1 think the issues in this case, these fighters certainly would
2 deserve every penny that they are entitled to for the claims.
3 And that's the one thing I would want to make sure, again, given
4 the size of the claim, there really should be no reason, unless
5 the fighter's completely missing, that the fighters should not
6 get the money who are in the class.

7 And so I would anticipate and hope a very high claims
8 rate in this case. Again, you know, things happen in terms of
9 being able to contact people, but given the amount of the
10 settlement, you all have the resources to be able to track down
11 just about anyone across the globe, I would imagine. And so I
12 would hope and expect that that's what will happen and that's
13 one of the questions I will, just so you know, ask as it relates
14 to the claims rate. Because I just expect, absent someone
15 having passed away or some other circumstances, that we should
16 have a claims rate close to, I don't know, 80 to 90 percent.

17 MR. CRAMER: We're -- we're going to work as hard as we
18 can to make sure that happens. And even where someone passed
19 away, we're going to attempt to contact their -- their
20 representatives or heirs.

21 THE COURT: Right. Well, because they would still be
22 entitled --

23 MR. CRAMER: Yes.

24 THE COURT: -- to a portion of that. So if you need
25 any orders from me as it relates to that, please let me know

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1 again because I know that there have at least been
2 communications in terms of what you all filed about fighters who
3 may have had some health issues. And so if you need any
4 additional orders from the Court as relates to being able to
5 provide or clarify anything with respect to a fighter's claim
6 with respect to the settlement, please let me know.

7 MR. CRAMER: We appreciate that. There is this cottage
8 industry in class actions where there are these entities that
9 attempt to approach class members for a significant part of
10 the -- their claim to simply just file the claim for them.

11 THE COURT: Right.

12 MR. CRAMER: And we are going to make sure that that
13 doesn't happen because we're making the claims process very
14 easy. We're going to have a preprinted form. All the fighters
15 need to do is sign it and send it back. They don't have to
16 provide any information. We have that information already.

17 THE COURT: I assume you have a call-in number for them
18 as well.

19 MR. CRAMER: We have a call-in number. I've -- I've
20 told every fighter I've talked to they can talk to me directly.
21 I've talked to dozens of fighters. Mr. Maysey has talked to
22 dozens of fighters. So all of our named class representatives
23 have talked to other fighters. They have a WhatsApp where they
24 communicate. So we're doing our best to make sure that
25 everybody knows about the settlement.

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1 THE COURT: Well, again, given the amount that the
2 fighters will receive potentially individually, I would hate for
3 them to have to be subject to some type of unscrupulous activity
4 as it relates to filing the claim. This should be a fairly
5 straightforward claims process.

6 I hope all of the fighters who are here in the class
7 recognize that and communicate that for the people you know that
8 people can get assistance if they think it's appropriate, but
9 they shouldn't be having to give up any substantial or even a
10 small portion of the settlement amount that they have. So I
11 hope you all will communicate that because I think that's
12 significant because people take advantage of these situations
13 and so we wouldn't want that to happen.

14 And you all will alert me, Mr. Cramer, Mr. Isaacson, if
15 you all become aware of any sort of activity by individuals or
16 by lawyers trying to in any way manipulate the fighters who are
17 members of the class.

18 MR. CRAMER: We will do that, Your Honor.

19 THE COURT: All right.

20 MR. CRAMER: Thank you.

21 THE COURT: All right, Mr. Cramer. Is there anything
22 else that we need to do today?

23 MR. CRAMER: No, Your Honor. Thank you.

24 THE COURT: All right. Mr. Isaacson, anything else we
25 need to do today from the defendants?

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1 MR. ISAACSON: Nothing further, Your Honor.

2 THE COURT: All right. Thank you all for your time.

3 We will -- again, I'll sign the proposed order. We'll look at,
4 you know, the final date when you all come back, but we have a
5 little bit of time between now and then. Okay?

6 All right. I'm going to stay on the bench to fix this
7 technical issue, but we will be adjourned. Thank you.

8 MR. CRAMER: Thank you, Your Honor.

9 (Whereupon proceedings concluded at 9:46 a.m.)

10 --oOo--

11 COURT REPORTER'S CERTIFICATE

12
13 I, PATRICIA L. GANCI, Official Court Reporter, United
14 States District Court, District of Nevada, Las Vegas, Nevada,
15 certify that the foregoing is a correct transcript from the
16 record of proceedings in the above-entitled matter.

17

18 Date: February 17, 2025.

19 /s/ **Patricia L. Ganci**

20 Patricia L. Ganci, RMR, CRR

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